

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL
INSTRUMENTS ANTITRUST LITIGATION

MDL No. 2262

THIS DOCUMENT RELATES TO:

Master File No. 1:11-md-2262-NRB

ECF Case

MAYOR AND CITY COUNCIL OF BALTIMORE,
ET AL.,

Plaintiffs,

v.

CREDIT SUISSE GROUP AG, ET AL.,
Defendants.

METZLER INVESTMENT GMBH, ET AL.,
Plaintiffs,

v.

CREDIT SUISSE GROUP AG, ET AL.,
Defendants.

GELBOIM, ET AL.,

Plaintiffs,

v.

CREDIT SUISSE GROUP AG, ET AL.,
Defendants.

CHARLES SCHWAB BANK, N.A., ET AL.,
Plaintiffs,

v.

BANK OF AMERICA CORPORATION, ET AL.
Defendants.

SCHWAB MONEY MARKET FUND, ET AL.,
Plaintiffs,

v.

BANK OF AMERICA CORPORATION, ET AL.,
Defendants.

SCHWAB SHORT-TERM BOND MARKET
FUND, ET AL.,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION, ET AL.,
Defendants.

**DECLARATION OF LAWRENCE J. ZWEIFACH IN SUPPORT
OF DEFENDANT UBS AG's MOTION TO DISMISS**

I, LAWRENCE J. ZWEIFACH, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, counsel of record in the above-captioned action for UBS AG. I make this declaration based on personal knowledge.

2. Attached hereto as Exhibit 1 is a true and correct copy of a newspaper article entitled *Study Casts Doubt on Key Rate*, which appeared in the *Wall Street Journal* on May 29, 2008.

3. Attached hereto as Exhibit 2 is a true and correct copy of a working paper entitled *Does the LIBOR Reflect Banks' Borrowing Costs?*, dated April 2, 2010.

4. Attached hereto as Exhibit 3 is a true and correct copy of a law review article entitled *LIBOR Left in Limbo; A Call for More Reform*, which appeared in the North Carolina Banking Institute Journal in 2009.

5. Attached hereto as Exhibit 4 is a true and correct copy of a news article entitled *Libor Probe Said to Expose Collusion, Lack of Internal Controls*, which was published by Bloomberg on February 14, 2012.

6. Attached hereto as Exhibit 5 is a true and correct copy of a news article entitled *Life as Libor Traders Knew It Seen as Abusive by Investigators*, which was published by Bloomberg on March 2, 2012.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this
29th day of June, 2012 at New York, New York.

/s/ Lawrence J. Zweifach

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